

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

KIRSTJEN M. NIELSEN, *et al.*,

Defendants.

Case No. 1:18-cv-00068

**FEDERAL DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT**

Pursuant to Local Rule LR 7.8, Federal Defendants hereby move to extend the deadline to answer or otherwise respond to Plaintiffs' Amended Complaint (ECF. No. 104), filed on June 25, 2018, until and including **July 23, 2018**. Given the ongoing and substantial developments in this matter, Federal Defendants request additional time to compose an answer after concluding depositions across several states and working diligently to meet the July 6, 2018, discovery deadline. By email dated June 29, 2018, Plaintiffs' counsel has indicated his consent to this extension. The requested extension will have no impact on other deadlines in this matter.

A Proposed Order is attached hereto.

Dated: July 2, 2018

CHAD A. READLER
Acting Assistant Attorney General
Civil Division

BRETT A. SHUMATE
Deputy Assistant Attorney General

WILLIAM C. PEACHEY
Director, Office of Immigration Litigation
District Court Section

Respectfully submitted,

JEFFREY S. ROBINS
Assistant Director
Lead Attorney

/s/ Aaron S. Goldsmith

AARON S. GOLDSMITH
Senior Litigation Counsel
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
District Court Section
P.O. Box 868, Washington, DC 20044
Telephone: (202) 532-4107
Facsimile: (202) 305-7000
aaron.goldsmith@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2018, I electronically filed the foregoing with the Clerk of the Court by using the Court's CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Aaron S. Goldsmith

AARON S. GOLDSMITH

Senior Litigation Counsel

U.S. Department of Justice, Civil Division

Attorney for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

KIRSTJEN M. NIELSEN, *et al.*,

Defendants.

Case No. 1:18-cv-00068

**[PROPOSED] ORDER EXTENDING TIME TO RESPOND
TO PLAINTIFFS' AMENDED COMPLAINT**

WHEREFORE, at the request of counsel for Defendants, and with consent of Plaintiffs' Counsel,

IT IS HEREBY ORDERED that the date for Defendants to respond to Plaintiffs' Amended Complaint, filed June 25, 2018, is hereby extended to July 23, 2018.

SO ORDERED.

Signed on July ___, 2018, at Brownsville, TX.

Honorable Andrew S. Hanen
United States District Judge